REMARKS

Claims 1-30 are pending in the application.

Claims 1-30 are rejected.

Each of the various rejections and objections are overcome by amendments that are made to the specification, drawing, and/or claims, as well as, or in the alternative, by various arguments that are presented.

Entry of this Amendment is proper under 37 CFR §1.116 since the amendment: (a) places the application in condition for allowance for the reasons discussed herein; (b) does not raise any new issue requiring further search and/or consideration since the amendments amplify issues previously discussed throughout prosecution; (c) satisfies a requirement of form asserted in the previous Office Action; (d) does not present any additional claims without canceling a corresponding number of finally rejected claims; or (e) places the application in better form for appeal, should an appeal be necessary. The amendment is necessary and was not earlier presented because it is made in response to arguments raised in the final rejection. Entry of the amendment is thus respectfully requested.

Any amendments to any claim for reasons other than as expressly recited herein as being for the purpose of distinguishing such claim from known prior art are not being made with an intent to change in any way the literal scope of such claims or the range of equivalents for such claims. They are being made simply to present language that is better in conformance with the form requirements of Title 35 of the United States Code or is simply clearer and easier to understand than the originally presented language. Any amendments to any claim expressly made in order to distinguish such claim from known prior art are being made only with an intent to change the literal scope of such claim in the most minimal way, i.e., to just avoid the prior art in a way that leaves the claim novel and not obvious in view of the cited prior art, and no equivalent of any subject matter remaining in the claim is intended to be surrendered.

Also, since a dependent claim inherently includes the recitations of the claim or chain of claims from which it depends, it is submitted that the scope and content of any dependent claims that have been herein rewritten in independent form is exactly the same as the scope and content of those claims prior to having been rewritten in independent form. That is, although by convention such rewritten claims are labeled herein as having been "amended," it is submitted that only the format, and not the content, of these claims has been changed. This is true whether a dependent claim has been rewritten to expressly include the limitations of those claims on which it formerly depended or whether an independent claim has been rewritten to include the limitations of claims that previously depended from it. Thus, by such rewriting no equivalent of any subject matter of the original dependent claim is intended to be surrendered. If the Examiner is of a different view, he is respectfully requested to so indicate.

35 USC 103(a)

Claims 1, 4, 5-12, 15-21 and 24-30

Claims 1, 4, 5-12, 15-21 and 24-30 have been rejected under 35 USC §103(a) as being unpatentable over Havinis et al. (US 2003/0202521, hereinafter Havinis) in view of Higuchi (US 2005/0286501, hereinafter Higuchi). The rejection is respectfully traversed.

The Applicants have considered the Examiner's "Response to Arguments" and thank the Examiner for clearly explaining his position. The Applicants note the Examiner's point that the Havinis HLR does process both B numbers and C numbers in the embodiments discussed in Havinis. However, the Applicants still respectfully maintain that this is not equivalent to the claimed "querying a unified location management device having **location information stored for users** of said **different network protocols**," as recited in Applicants' independent claim 1.

A 'B-number,' Havinis explains, is a number **supplied by a subscriber** of a first network, belonging to a subscriber of a second network whom the subscriber of the first network wishes to call (see Havinis, par. 6, ll. 1-3). Likewise, a 'C-

number' is a number associated with a third network, which is **supplied by the subscriber** receiving the call at the 'B-number' in the second network, to which the subscriber in the second network wishes respective calls received at the 'B-number' to be forwarded (par. 24, ll. 15-17) – e.g. if the called subscriber is not in proximity to the second network. At no time however, are the 'B' and 'C' numbers ever stored in any type repository, much less a repository equivalent to the claimed "unified location management device having **location information stored for users** of said **different network protocols**." As mentioned, they are provided strictly **by the respective subscribers**.

Havinis is directed toward:

> *Since **neither the calling subscriber 100 nor the caller's network 110 usually have knowledge of the called subscriber's 300 multi-media capabilities 215**, to foster multi-media interworking, an attribute 120 can be added to the called control protocol to indicate the calling subscriber's multi-media encoding. This attribute 120 can be used to negotiate the multi-media coding between the different nodes involved in a call. Based on the negotiation, **appropriate MG's (Media Gateway's) 350 can be selected which perform the necessary networking**.* (par. 17, ll. 9-19, emphasis and acronym explanation added)

That is, routing of calls through different nodes/network-types is based on an attribute added **by the network from which a call originates**, containing **only** the multi-media multi-media coding methodologies utilized **by that network**. If a subscriber receiving a call in a respective network happens to want that call forwarded to yet another network (e.g. from a 'B-number' to a 'C-number' - Havinis par. 24), the network performing the forwarding operation still only supplies an attribute based on its specific coding methodologies associated with the 'B-number' network – no other network. Any 'C-number' that is processed is still **supplied by a subscriber**, not a "unified location management device."

To that end, the Applicants respectfully maintain the Home Location Register, which the Examiner suggests is equivalent to the claimed "unified location management device" does not contain "**location information stored for**

users of said **different network protocols**." Rather, the Havanis Home Location Register **only** contains information pertaining to Public Land Mobile Network (PLMN) 210. This is evidenced not only by HLR 280 and GMSC 270 being entirely contained in/by the PLMN 210 of Havinis Figure 1, and no process described in Havinis suggesting HLR 280 is associated with any other network besides PLMN 210, but Havinis clearly establishing the HLR as "**associated with the called MS 200**" (par. 20, ll. 5-6, emphasis added), wherein MS 200 is a terminal in PLMN 210.

For at least the reasons discussed above, Havinis fails to teach or suggest at least the limitation of a "unified location management device having **location information stored for users** of said **different network protocols**."

Higuchi fails to bridge the substantial gap between Havinis and Applicants' invention. Higuchi teaches a media communication system in which communication of media is constructed to communicate exclusively across an IP network (see Higuchi, Abstract). Hence, Higuchi is not directed toward communicating between networks supporting "different network protocols," much less the claimed "unified location management device having **location information stored for users** of said **different network protocols**," nor does Higuchi provide any motivation to arrive at the Applicants' claimed invention either.

As such, the Applicants submit that claim 1 is not obvious over Havinis in view of Higuchi, and is patentable under 35 U.S.C. §103

Applicants' independent claims 12 and 21 recite similar limitations as independent claim 1, and are therefore allowable for the same reasons provided above pertaining to claim 1. Claims 4, 5-11, 15-20 and 24-30 depend directly or indirectly from, and include each and every limitation of independent claims 1, 12 and 21. Claims 4, 5-11, 15-20 and 24-30 are therefore allowable for the same reasons.

Claims 2, 3, 13, 14, 22 and 23

Claims 2, 3, 13, 14, 22 and 23 have been rejected under 35 USC §103(a) as being unpatentable over Havinis in view of the admitted prior art. The rejection is respectfully traversed.

Claims 2, 3, 13, 14, 22 and 23 depend directly or indirectly from independent claims 1, 12 and 21. Moreover, for at least the reasons discussed above, the Havinis and Higuchi references fail to teach or suggest Applicants' invention as recited in claims 1, 12 and 21. Accordingly, any attempted combination of the Havinis and Higuchi references with any other additional references, in a rejection against the dependent claims, would still result in a gap in regards to the rejection against the independent claims. As such, Applicants submit that dependent claims 2, 3, 13, 14, 22 and 23 are not obvious and are patentable under 35 U.S.C. §103.

CLAIM AMENDMENTS

Independent claims 1, 12 and 21 have been amended for clarity. Specifically, the wordeage "...the mobile device can bypass..." has been replaced by -- ...the mobile device bypasses... --.

Conclusion

Based on the above remarks and amendments to the claims, Applicants submit that the claims have been shown to be allowable in view of the prior art and that the basis for any rejections has been overcome.

In view of the foregoing, allowance of all the claims presently in the application is respectfully requested, as is passage to issuance of the application. If the Examiner should feel that the application is not yet in a condition for allowance and that a telephone interview would be useful, he is invited to contact Applicants' undersigned attorney at 732-530-9404.

Respectfully submitted,

Dated: 5/8/08

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